

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

NO. 4:12-CV-00154-D

NORTH CAROLINA ENVIRONMENTAL)
JUSTICE NETWORK, NEUSE)
RIVERKEEPER FOUNDATION, INC.,)
and WATERKEEPER ALLIANCE, INC.,)
Plaintiffs,)

vs.)

DONALD TAYLOR and MS. ANNIE)
TAYLOR, individually and d/b/a TAYLOR)
FINISHING, MCLAWHORN LIVESTOCK)
FARM, INC., JUSTIN T. MCLAWHORN,)
and AARON MCLAWHORN,)
Defendants.)

DEFENDANTS MCLAWHORN LIVESTOCK
FARM, INC., JUSTIN T. MCLAWHORN, AND
AARON MCLAWHORN'S MOTION FOR
EXTENSION OF TIME

COME NOW Defendants McLawhorn Livestock Farm, Inc., Justin T. McLawhorn and Aaron McLawhorn (referred to collectively as "Defendants"), by and through the undersigned counsel, and hereby move the Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, for an order extending the time to and including March 24, 2014 in which to respond to Plaintiff's First Set of Requests for Production of Documents to Defendants J. McLawhorn, A. McLawhorn, and McLawhorn Livestock Farm, Inc. In support of this Motion, Defendants show unto the Court as follows:

1. Defendants were served with Plaintiff's First Set of Requests for Production of Documents to Defendants J. McLawhorn, A. McLawhorn, and McLawhorn Livestock Farm, Inc. ("Plaintiff's Discovery Requests") on January 22, 2014.
2. Defendants' deadline to respond to Plaintiffs' Discovery Requests is February 21, 2014.
3. Defendants' time for responding to Plaintiffs' Discovery Requests has not yet expired.

4. Defendants request an additional thirty (30) days or until March 24, 2014 to respond to Plaintiffs' Discovery Requests.

5. Plaintiffs' counsel consent to the requested extension of time.

WHEREFORE, Defendants McLawhorn Livestock Farm, Inc., Justin T. McLawhorn and Aaron McLawhorn request that the Court grant an extension of time to respond to Plaintiffs' Discovery Requests, to and including March 24, 2014.

This 21st day of February, 2014.

/s/ John W. King, Jr.

JOHN W. KING, Jr.

N.C. State Bar No. 9306

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Farm, Inc., Justin T. McLawhorn, and Aaron
McLawhorn*

CERTIFICATE OF SERVICE

I, John W. King, Jr. Post Office Box 1654, New Bern, North Carolina 28563, certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on the 21st day of February, 2014, I served copies of the foregoing pleading on the parties shown below as indicated. I certify under penalty of perjury that the foregoing is true and correct.

This 21st day of February, 2014.

/s/ John W. King, Jr.
JOHN W. KING, Jr.
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